

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	SEALED
	§	
v.	§	No. 4:23CR268
	§	Judge Jordan
WILLIAM McKINNLEY GARLAND (1)	§	
a/k/a Evangelista, a/k/a Lobo,	§	
a/k/a Vangelisa, a/k/a Ville,	§	
a/k/a Lex, a/k/a “V,” a/k/a Victor	§	
Yamaguchi	§	
JALEN ALEXANDER BOBO (2)	§	
ROBERTA MARIE KHAN (4)	§	
a/k/a Roberta Marie Khan,	§	
a/k/a Ember, a/k/a Scarecrow	§	

**GOVERNMENT’S MOTION FOR LEAVE TO FILE MOTIONS
FOR LIMITED UNSEALING AND PROTECTIVE ORDER UNDER SEAL**

The United States, by and through the undersigned Assistant United States Attorney, respectfully requests leave to file under seal the government’s Motions for Limited Unsealing and for a Protective Order as the search warrants in the subject case contain personal identifying details about victims, the defendants, and other involved persons, as well as information about sensitive law enforcement techniques. Accordingly, the undersigned seeks permission to file the motions under seal.

CONCLUSION

Based on the foregoing, counsel for the United States requests that this Court grant the government’s Motion for Leave to File its Motions for Limited Unsealing and Protective Order under seal.

Respectfully submitted,

DAMIEN M. DIGGS
UNITED STATES ATTORNEY

/s/
MARISA J. MILLER
Assistant United States Attorney
New York Bar No. 4366415
101 East Park Boulevard, Suite 500
Plano, Texas 75074
(972) 509-1201
Marisa.Miller@usdoj.gov

CERTIFICATE OF CONFERENCE

I certify that I conferenced with Rafael De La Garza, Esq., counsel for defendant William McKinnley Garland; Brian O'Shea, Esq., counsel for defendant Robberta Marie Khan; and Richard Howard, Esq., counsel for defendant Jalen Alexander Bobo. Counsel for these defendants are unopposed this motion.

/s/
Marisa J. Miller

CERTIFICATE OF SERVICE

I certify a true and correct copy of the Motion for Leave to File Motions for Limited Unsealing and Protective Order under seal was served by electronic filing (CM/ECF) to counsel for all defendants on this 2nd day of January 2024.

/s/
Marisa J. Miller